

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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LOUIS DREYFUS CORPORATION,

08 CV. 1899 (DAB)

Plaintiff,

- against -

**ANSWER TO
CROSS-CLAIM**

MAERSK FREEMANTLE, her engines, boiler,
tackle, etc., MS CONTESTE BERND
BARTELS KG GMBH & CO., BERND
BARTELS, A.P. MOLLER MAERSK A/S
(MAERSK LINE), SAFEWAY TRUCKING
CORPORATION and EAST COAST CES INC.,

Defendants.
-----X

Defendant MS CONTESTE REEDEREI BERND BARTELS GMBH & Co. KG
sued herein as MS Conteste Bernd Bartels KG GmbH & Co., for its Answer to the Cross-
Claim of defendant A.P. Moller Maersk A/S (Maersk Line) alleges upon information and
belief as follows:

1. It denies each and every allegation of the Cross-Claim of defendant of
A.P. Moller-Maersk A/S (Maersk Line).

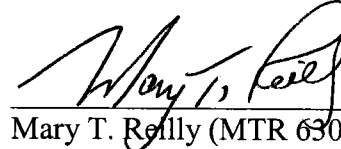
WHEREFORE, Defendant MS Conteste Reederei Bernd Bartels GmbH & Co.
KG prays that the Cross-Claim of defendant A.P. Moller Maersk A/S (Maersk Line)
against it be dismissed and that its Cross-Claim be granted, and that the Court may

grant any such other or further relief as may be just and proper.

Dated: New York, New York
August 19, 2008

HILL, BETTS & NASH, LLP

By:



Mary T. Reilly (MTR 6305)
Attorneys for Defendant MS
Conteste Reederei Bernd Bartels
GmbH & Co. KG
One World Financial Center
200 LIBERTY STREET, 26th Floor
New York, New York 10281
(212) 839-7000

To: Kingsley, Kingsley & Calkins
Attorneys for Plaintiff
91 West Cherry Street
Hicksville, NY 11801
Attention: Harold M. Kingsley, Esq.

Freehill, Hogan & Mahar, LLP
Attorneys for Defendant AP Moller Maersk (Maersk Line)
80 Pine Street
New York, New York 10005
Attention: James L. Ross, Esq.

Law Office of John P. Humphreys
Attorneys for Defendants Safeway Trucking Corporation and
East Coast CES Inc.
3 Huntington Quadrangle, Suite 1028
P.O. Box 9028
Melville, NY 11747
Attention: David L. Robinson, Esq.

AFFIDAVIT OF SERVICE BY MAIL

STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

JOAN KARLSON, being duly sworn deposes and says, I am not a party to the action and over 18 years of age.

That on the 20th day of August 2008 she served the attached Answer to Cross-Claim of Defendant A.P. Moller Maersk A/S (Maersk Line) upon:

Kingsley, Kingsley & Calkins
Attorneys for Plaintiff
91 West Cherry Street
Hicksville, NY 11801
Attention: Harold M. Kingsley,
Esq.

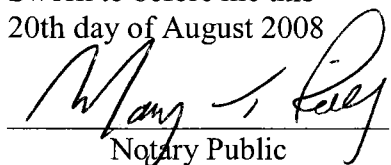
Freehill, Hogan & Mahar, LLP
Attorneys for Defendant AP Moller
Maersk (Maersk Line)
80 Pine Street
New York, New York 10005
Attention: James L. Ross, Esq.

Law Office of John P. Humphreys
Attorneys for Defendants Safeway
Trucking Corporation and
East Coast CES Inc.
3 Huntington Quadrangle, Suite
1028
P.O. Box 9028
Melville, NY 11747
Attention: David L. Robinson, Esq.

by depositing a true copy of the papers, enclosed in a post-paid wrapper, in an official depository under the exclusive care and custody of the U.S. Postal Service, addressed to the foregoing attorneys.


JOAN KARLSON

Sworn to before me this
20th day of August 2008


Notary Public

{NY075907.2 }

MARY T. REILLY
Notary Public, State of New York
No. 02RE6055119
Qualified in Kings County
Commission Expires 2/20/11